

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE

PERMITTEE

Gateway Packaging, LLC  
Attn: Mr. Steve Beck, VP of Operations  
#20 Central Industrial Drive  
Granite City, Illinois 62040

<u>Application No.:</u> 10040046	<u>I.D. No.:</u> 119040ATD
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 26, 2010
<u>Subject:</u> Flexographic and Lithographic Printing and Laminating Operations	
<u>Date Issued:</u> September 3, 2014	<u>Expiration Date:</u> September 3, 2024
<u>Location:</u> #20 Central Industrial Drive, Granite City, Madison County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two (2) non-heatset litho printers, seven (7) flexographic printers (flexible packaging), two (2) lamination lines, five (5) bag-making machines, and tuber/bottomer pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- ii. To establish area source status under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK. This is accomplished through the establishment of federally enforceable production limitations on the usage of HAP at the facility, including materials used for source categories or purposes other than printing and publishing, to less than 10 tons/year for any individual HAP and 25 tons/year of any combination of such HAPs.
- iii. To establish federally enforceable production and operating limitations, which restrict the maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines to 90.7 Mg (100 tons) or less per calendar year so that the flexographic and rotogravure printing lines at this source are not subject to the limitations of 35 Ill. Adm. Code 219.401 (Flexographic and Rotogravure Printing).



- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. The wide-web flexographic printing presses at this source are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 63.820(a)(2), each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of 40 CFR 63.820(a)(2)(i) and (ii) for purposes of establishing the facility to be an area source of HAP with respect to 40 CFR 63 Subpart KK. A facility which establishes area source status through some other mechanism, as described in 40 CFR 63.820(a)(7), is not subject to the provisions of 40 CFR 63 Subpart KK.
    - i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
    - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
  - c. Pursuant to 40 CFR 63.820(a)(3), each facility for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
  - d. Pursuant to 40 CFR 63.820(a)(4), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
  - e. Pursuant to 40 CFR 63.820(a)(5), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) to become an area source, but subsequently exceeds either of the thresholds in 40 CFR 63.820(a)(2) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-



month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of 40 CFR 63 Subpart KK as noted in 40 CFR 63.820(a)(1) and would no longer be eligible to use the provisions of 40 CFR 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2).

- f. Pursuant to 40 CFR 63.820(a)(6), an owner or operator of an affected source subject to 40 CFR 63.820(a)(2) who chooses to no longer be subject to 40 CFR 63.820(a)(2) shall notify the Illinois EPA or USEPA of such change. If, by no longer being subject to 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source:
  - i. The owner or operator of an existing source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for existing affected sources under 40 CFR 63 Subpart KK;
  - ii. The owner or operator of a new source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources under 40 CFR 63 Subpart KK.
- 3. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- 4a. Pursuant to 35 Ill. Adm. Code 219.204(c), except as provided in 35 Ill. Adm. Code 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Paper Coating. Except as otherwise provided in 35 Ill. Adm. Code 219.204(a), (c), (g), (h), (j), (l), (n), (o), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code Part 219 Subpart F (Coating Operations) must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 219.206 shall be used to calculate emission limitations for determining compliance by add-on controls, credits for transfer efficiency, emissions trades and cross-line averaging.) The emission limitations are as follows:



- |  |   |   |
|--|---|---|
| On and after May 1, 2011:                              | kg VOM/kg<br>(lb VOM/lb)<br>solids<br>applied | kg VOM/kg<br>(lb VOM/lb)<br>coatings<br>applied |
| ii. Pressure sensitive tape and label surface coatings | 0.20  | (0.067)   |
| ii. All other paper coatings                           | 0.40  | (0.08)  |
- b. Pursuant to 35 Ill. Adm. Code 219.301, no person shall cause or allow the discharge of more than 3.6 kgs/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 219.302, 219.303, 219.304 and the following exemption: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 219 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
- c. Pursuant to 35 Ill. Adm. Code 219.402(b), the limitations of 35 Ill. Adm. Code 219.401(d) shall apply to all owners or operators of flexographic or rotogravure printing lines that print flexible packaging, or that print flexible packaging and non-flexible packaging on the same line, at a source where the combined emissions of VOM from all flexographic and rotogravure printing lines total 6.8 kg/day (15 lbs/day) or more (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines), in the absence of air pollution control equipment.
- d. Pursuant to 35 Ill. Adm. Code 219.407(a), no owner or operator of lithographic printing lines subject to the requirements of 35 Ill. Adm. Code Part 219 Subpart H (Printing and Publishing) shall:
- i. Cause or allow the operation of any non-heatset web offset lithographic printing line unless the VOM content of the as-applied fountain solution is 5 percent or less, by weight, and the as-applied fountain solution contains no alcohol;
  - ii. Cause or allow the use of a cleaning solution on any lithographic printing line unless:
    - A. The VOM content of the as-used cleaning solution is less than or equal to:
      - I. 30 percent, by weight; or
      - II. On and after August 1, 2010, for owners or operators of sources that meet the applicability criteria in 35 Ill. Adm. Code 219.405(c)(3) and do not certify pursuant to 35 Ill. Adm. Code 219.411(g)(1)(B) that the source will not make use of any of the exclusions



in 35 Ill. Adm. Code 219.405(c)(3), 70 percent, by weight; or

B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

iii. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.

e. Pursuant to 35 Ill. Adm. Code 219.900(a), except as provided in 35 Ill. Adm. Code 219.900(b), on and after May 1, 2012, the requirements of 35 Ill. Adm. Code Part 219 Subpart JJ (Miscellaneous Industrial Adhesives) shall apply to miscellaneous industrial adhesive application operations at sources where the total actual VOM emissions from all such operations, including related cleaning activities, equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 219.904(a)(1)(B), in the absence of air pollution control equipment.

f. Pursuant to 35 Ill. Adm. Code 219.901(b)(1), the owner or operator of adhesive application operations listed in 35 Ill. Adm. Code 219.901(b) shall comply with the following VOM emission limitations, minus water and any compounds that are specifically exempted from the definition of VOM, as applied. If an adhesive is used to bond dissimilar substrates together, the substrate category with the highest VOM emission limitation shall apply:

kg VOM/l	lb VOM/gal
adhesive	adhesive
or	or
adhesive	adhesive
primer	primer
applied	applied

General adhesive application operations

i. Porous material (except wood)	0.120	(1.0)
ii. Other substrates	0.250	(2.1)

5. This permit is issued based upon the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3330(b), any web coating line that is a product and packaging rotogravure or wide-web flexographic press under 40 CFR 63 Subpart KK (National Emission Standards for The Printing And Publishing Industry) which is included in the affected source under 40 CFR 63 Subpart KK are not part of the affected source of 40 CFR 63 Subpart JJJJ.

6. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through



212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

7a. Pursuant to 35 Ill. Adm. Code 219.187(a)(2), notwithstanding 35 Ill. Adm. Code 219.187(a)(1):

i. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (e), (f), and (g):

- A. Janitorial cleaning;
- B. Stripping of cured coatings, inks, or adhesives;
- C. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning;

ii. Cleaning operations for emission units within the following categories shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (e), (f), and (g):

- A. Flexible package printing;
- B. Lithographic printing;
- C. Paper, film, and foil coating;
- D. Miscellaneous industrial adhesives;

b. Pursuant to 35 Ill. Adm. Code 219.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 219.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code Part 219 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code Part 219 Subpart TT (Other Emission Units). On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.

c. Pursuant to 35 Ill. Adm. Code 219.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 is required to meet the limitations of 35 Ill. Adm. Code Part 219 Subpart



G (35 Ill. Adm. Code 219.301 or 219.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 219.204.

- d. Pursuant to 35 Ill. Adm. Code 219.402(a)(2), except as otherwise provided in 35 Ill. Adm. Code 219.401, the limitations of 35 Ill. Adm. Code 219.401 apply to all flexographic and rotogravure printing lines at a subject source. All sources with flexographic and/or rotogravure printing lines are subject sources unless a federally enforceable permit or SIP revision for all flexographic and rotogravure printing lines at a source requires the owner or operator to limit production or capacity of these printing lines to reduce total VOM emissions from all flexographic and rotogravure printing lines to 90.7 Mg (100 tons) or less per calendar year before the application of capture systems and control devices.
- e. Pursuant to 35 Ill. Adm. Code 219.900(b)(1), notwithstanding 35 Ill. Adm. Code 219.900(a): The requirements of 35 Ill. Adm. Code Part 219 Subpart JJ shall not apply to miscellaneous industrial adhesive application operations associated with the following:
  - i. Paper, film, and foil coatings;
  - ii. Lithographic printing;
  - iii. Flexible package printing;
- 8a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for the execution of the operating program;



- iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter), including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - v. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code Part 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 9a. Pursuant to 35 Ill. Adm. Code 219.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 219.204(c) shall:
- i. Store all VOM-containing cleaning materials in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;
  - iii. Minimize spills of VOM-containing cleaning materials;
  - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
  - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- b. Pursuant to 35 Ill. Adm. Code 219.401(d), no owner or operator of subject flexographic or rotogravure printing lines that print flexible packaging or print flexible packaging and non-flexible packaging on the same line shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the subject flexographic or rotogravure printing lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed



from one location to another in any manner other than in closed containers or pipes, except when specifically in use.

- c. Pursuant to 35 Ill. Adm. Code 219.402(e), any owner or operator of any flexographic or rotogravure printing line that is exempt from any of the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402 is subject to the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.404(b) and (f), as applicable.
- d. Pursuant to 35 Ill. Adm. Code 219.405(c)(3), on and after August 1, 2010: Notwithstanding 35 Ill. Adm. Code 219.405(c)(2), at sources where the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) equal or exceed 6.8 kg/day (15 lbs/day) but do not exceed 45.5 kg/day (100 lbs/day), calculated in accordance with 35 Ill. Adm. Code 219.411(b)(1)(B), before the application of capture systems and control devices, the following exclusions shall apply unless the owner or operator of the source certifies pursuant to 35 Ill. Adm. Code 219.411(g)(1)(B) that the source will not make use of any such exclusions:
  - i. The requirements of 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2), and (a)(3) shall not apply to lithographic printing lines with a total fountain solution reservoir of less than 3.8 liters (1 gallon);
  - ii. The requirements of 35 Ill. Adm. Code 219.407(a)(4) shall not apply to up to a total of 416.3 liters (110 gallons) per year of cleaning materials used on all lithographic printing lines at the source;
  - iii. The requirements of 35 Ill. Adm. Code 219.407(a)(4)(A)(i) shall not apply to lithographic printing lines at the source. Instead, the requirements of 35 Ill. Adm. Code 219.407(a)(4)(A)(ii) shall apply to such lines.
- e. Pursuant to 35 Ill. Adm. Code 219.901(e), the owner or operator of a source subject to 35 Ill. Adm. Code Part 219 Subpart JJ shall apply all miscellaneous industrial adhesives using one or more of the following methods:
  - i. Electrostatic spray;
  - ii. High volume low pressure (HVLP) spray;
  - iii. Flow coating. For the purposes of 35 Ill. Adm. Code Part 219 Subpart JJ, flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;



- iv. Roll coating or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application;
  - v. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code Part 219 Subpart JJ, "electrodeposition" means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
  - vi. Airless spray;
  - vii. Air-assisted airless spray; or
  - viii. Another adhesive application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- f. Pursuant to 35 Ill. Adm. Code 219.901(f), the owner or operator of a source subject to 35 Ill. Adm. Code Part 219 Subpart JJ shall comply with the following work practices for each subject miscellaneous adhesive application operation at the source:
- i. Store all VOM-containing adhesives, adhesive primers, process-related waste materials, cleaning materials, and used shop towels in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials;
  - iii. Minimize spills of VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials;
  - iv. Convey VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials from one location to another in closed containers or pipes; and
  - v. Minimize VOM emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
10. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.



- 11a. Emissions and operation from all flexographic printing presses, lithographic presses, lamination lines, bag-making machines and tuber/bottomer shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
Solvent Based Inks	1,000	6.0	1,000	6.0
Water Based Inks	4,000	24.0	4,000	24.0
Energy Cured Inks	2,000	12.0	2,000	12.0
Adhesives (includes bag making & tuber/bottomer)	800	4.8	800	4.8
Solvents (Cleanup, etc.)	5,000	30.0	5,000	30.0
			Totals	76.8

These limits are based on the maximum material usage and the material balance. The VOM and HAP emissions shall be calculated using the following equation:

$$E = \sum (I_i \times V_{Ii}) + \sum (FS_j \times V_{FSj}) + \sum (CS_k \times V_{CSk}) - \sum \text{VOM Shipped Offsite}$$

Where:

E = VOM or HAP emissions (lbs or tons);

$I_i$  = Ink and coating usage (lbs or tons);

$V_{Ii}$  = VOM or HAP content of ink or coating (weight fraction);

$FS_j$  = Adhesive usage (lbs or tons);

$V_{FSj}$  = VOM or HAP content of adhesive (weight fraction);

$CS_k$  = Cleaning solution usage (lbs or tons); and

$V_{CSk}$  = VOM or HAP content of cleaning solution (weight fraction).

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities



of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 13a. Pursuant to 35 Ill. Adm. Code 219.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish the records required under 35 Ill. Adm. Code 219.211.
- b. Pursuant to 35 Ill. Adm. Code 219.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish the records required under 35 Ill. Adm. Code 219.404.
- c. Pursuant to 35 Ill. Adm. Code 219.409(a), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 219.407 shall be conducted by January 1, 2012, unless such testing was conducted on or after May 9, 1995, the test was conducted pursuant to a test method approved by USEPA, the current operating conditions and operating capacity of the press are consistent with the operation of the press during such testing, and the test results were submitted to the Illinois EPA. If an owner or operator of a printing line performed



such testing prior to May 9, 1995, the owner or operator shall either retest pursuant to 35 Ill. Adm. Code 219.409 or submit to the Illinois EPA all information necessary to demonstrate that the prior testing was conducted pursuant to a test method approved by USEPA, and that the current operating conditions and operating capacity of the press are consistent with the operation of the press during prior testing. Thereafter, testing shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code Part 219 Subpart H. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

- d. Pursuant to 35 Ill. Adm. Code 219.409(c), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 Ill. Adm. Code 219.411(a)(1)(B), (b)(1)(B), or (b)(2)(B), as applicable), shall be conducted upon request of the Illinois EPA or as otherwise specified in 35 Ill. Adm. Code Part 219 Subpart H, as follows:
  - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
  - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 219.105(a); provided, however, Method 24 shall be used to determine compliance.
- e. Pursuant to 35 Ill. Adm. Code 219.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. 219.110.
- f. Pursuant to 35 Ill. Adm. Code 219.902(a), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code Part 219 Subpart JJ shall be conducted by the owner or operator by May 1, 2012. Thereafter, testing shall be conducted within 90 days after a request by the Illinois EPA, or as otherwise provided in 35 Ill. Adm. Code Part 219 Subpart JJ. The testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during testing.



- g. Pursuant to 35 Ill. Adm. Code 219.902(b), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 219.901(b) shall be conducted as follows:
  - i. Method 24, shall be used for non-reactive adhesives. If it is demonstrated to the satisfaction of the Illinois EPA and the USEPA that plant adhesive formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern;
  - ii. Appendix A of 40 CFR 63, Subpart PPPP, shall be used for reactive adhesives;
  - iii. The manufacturer's specifications for VOM content for adhesives may be used if the specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 219.902(b)(1) and (b)(2), as applicable.
- 14a. Pursuant to 35 Ill. Adm. Code 219.410(a), Fountain Solution Temperature:
  - i. The owner or operator of any lithographic printing lines relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.
  - ii. The temperature monitor must be capable of reading with an accuracy of 1°C or 2°F, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.
- b. Pursuant to 35 Ill. Adm. Code 219.410(b), the owner or operator of any lithographic printing lines subject to 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2) or (a)(3) shall:
  - i. For a fountain solution to which VOM is not added automatically:
    - A. Maintain records of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 219.411(e)(2)(C); or
    - B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time



VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

- I. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
  - II. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;
- ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 219.411(e)(2)(D). The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.
- c. Pursuant to 35 Ill. Adm. Code 219.410(e), Cleaning Solution:
- i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 Ill. Adm. Code 219.407(a)(4)(A) must:



- A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
    - I. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
    - II. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 Ill. Adm. Code 219.407(a)(4)(A);
  - B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 Ill. Adm. Code 219.411(f)(2).
- ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 Ill. Adm. Code 219.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in 35 Ill. Adm. Code 219.411(f)(2)(C).
15. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR



63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

16. Pursuant to 40 CFR 63.829(d), the owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
- 17a. Pursuant to 35 Ill. Adm. Code 219.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating;
- b. Pursuant to 35 Ill. Adm. Code 219.211(g)(3), on and after a date consistent with 35 Ill. Adm. Code 219.106(c), or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.218 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 219.211(g) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- c. Pursuant to 35 Ill. Adm. Code 219.404(b)(2), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402(a) shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a facility referenced



in 35 Ill. Adm. Code 219.404(b) shall collect and record all of the following information each year for each printing line and maintain the information at the source:

- i. The name and identification number of each coating and ink as applied on each printing line.
  - ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.
- d. Pursuant to 35 Ill. Adm. Code 219.404(h), all records required by 35 Ill. Adm. Code 219.404(f) and (g) shall be retained for at least three years and shall be made available to the Illinois EPA upon request.
- e. Pursuant to 35 Ill. Adm. Code 219.411(e)(2), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2), or (a)(3), shall collect and record the following information for each fountain solution:
- i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;
  - ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 Ill. Adm. Code 219.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2), or (a)(3):
    - A. The date and time of preparation and each subsequent modification of the batch;
    - B. The results of each measurement taken in accordance with 35 Ill. Adm. Code 219.410(b);
    - C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
    - D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results;
  - iii. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 219.410(b)(1)(A), for each batch of as-applied fountain solution:



- A. Date and time of preparation and each subsequent modification of the batch;
  - B. Volume or weight, as applicable, and VOM content of each component used in, or subsequently added to, the fountain solution batch;
  - C. Calculated VOM content of the as-applied fountain solution; and
  - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2) and (a)(3);
- iv. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 219.410(b)(2), for each setting:
  - A. VOM content limit corresponding to each setting;
  - B. Date and time of initial setting and each subsequent setting;
  - C. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications; and
  - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2) and (a)(3).
- v. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 Ill. Adm. Code 219.407(a)(1)(A)(ii) or (a)(3)(B):
  - A. The temperature of the fountain solution at each printing line, as monitored in accordance with 35 Ill. Adm. Code 219.410(a); and
  - B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- f. Pursuant to 35 Ill. Adm. Code 219.411(f)(2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 219.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line:
  - i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm.



Code 219.407(a)(4)(A) and which is prepared at the source with automatic equipment:

- A. The name and identification of each cleaning solution;
  - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 219.409(c);
  - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
  - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
  - F. A calibration log for the automatic equipment, detailing periodic checks.
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 219.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 219.409(c);
  - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 219.105(a).



- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 Ill. Adm. Code 219.407(a)(4)(B):
  - A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 Ill. Adm. Code 219.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 219.105(a) and 219.110;
  - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 Ill. Adm. Code 219.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 219.105(a) and 219.110.
- iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.
- g. Pursuant to 35 Ill. Adm. Code 219.411(g)(2)(A), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 219.405(c)(3) shall: Unless the source has certified in accordance with 35 Ill. Adm. Code 219.411(g)(1)(B) that it will not make use of any of the exclusions set forth in 35 Ill. Adm. Code 219.405(c)(3): Collect and record the following information for all lithographic printing lines at the source:
  - i. Calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lbs/day) before the use of capture systems and control devices, determined in accordance with the calculations in 35 Ill. Adm. Code 219.411(b)(2)(B);



- ii. The name, identification, and volume of all cleaning materials used per calendar month on lithographic printing lines at the source that do not comply with the cleaning material limitations in 35 Ill. Adm. Code 219.407(a)(4).
  - h. Pursuant to 35 Ill. Adm. Code 219.904(b)(4), all sources subject to the requirements of 35 Ill. Adm. Code Part 219 Subpart JJ shall retain all records required by 35 Ill. Adm. Code 219.904 for at least three years and make those records available to the Illinois EPA upon request.
  - i. Pursuant to 35 Ill. Adm. Code 219.904(c)(2), the owner or operator of an adhesive application operation subject to the limitations of 35 Ill. Adm. Code 219.901 and complying by means of 35 Ill. Adm. Code 219.901(b) shall comply with the following: Collect and record the name, identification number, and VOM content of each adhesive as applied each day by each adhesive application operation complying with 35 Ill. Adm. Code 219.901(b).
- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Plant-wide usage of solvent based inks (lbs/month and tons/year);
  - ii. VOM and HAP content of solvent based inks (weight %);
  - iii. Plant-wide usage of water based inks (lbs/month and tons/year);
  - iv. VOM and HAP content of water based inks (weight %);
  - v. Plant-wide usage of energy cured inks (lbs/month and tons/year);
  - vi. VOM and HAP content of energy cured inks (weight %);
  - vii. Plant-wide usage of adhesives (lbs/month and tons/year);
  - viii. VOM and HAP content of adhesives (weight %);
  - ix. Plant-wide usage of solvents (lbs/month and tons/year);
  - x. VOM and HAP content of solvents (weight %);
  - xi. If claiming emission credit, amount of waste shipped off site, as documented by hazardous waste manifests for the waste shipments (tons/month and tons/year);
  - xii. If claiming emission credit for waste shipped offsite, VOM content of the waste with supporting basis(test results); and
  - xiii. Monthly and annual VOM and HAP emissions from the source, with supporting calculations (lbs/month, tons/year).



- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
19. Pursuant to 40 CFR 63.830(b)(6)(ii), each owner or operator of an affected source subject to 40 CFR 63 Subpart KK shall submit to the Illinois EPA or USEPA a summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 40 CFR 63.825. In addition to a report of operating parameter exceedance as required by 40 CFR 63.10(e)(3)(i), the summary report shall include exceedance of either of the criteria of 40 CFR 63.820(a)(2).
- 20a. Pursuant to 35 Ill. Adm. Code 219.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 219.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d) or (e), as applicable.
- b. Pursuant to 35 Ill. Adm. Code 219.211(g)(2), on and after a date consistent with 35 Ill. Adm. Code 219.106(c), or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.218 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.218 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;



- c. Pursuant to 35 Ill. Adm. Code 219.404(b)(3), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402(a) shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a facility exempted from the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402(a) shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
- d. Pursuant to 35 Ill. Adm. Code 219.404(g)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 219.401(d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.401(d) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.
- e. Pursuant to 35 Ill. Adm. Code 219.411(e)(3), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 219.407(a)(1)(A), (a)(2), or (a)(3), shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 219.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- f. Pursuant to 35 Ill. Adm. Code 219.411(f)(3), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 219.407 shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 219.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- g. Pursuant to 35 Ill. Adm. Code 219.411(g), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 219.405(c)(3) shall:
  - i. Unless the source has certified in accordance with 35 Ill. Adm. Code 219.411(g)(1)(B) that it will not make use of any of the exclusions set forth in 35 Ill. Adm. Code 219.405(c)(3): Notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs;



- ii. If changing from utilization of the exclusions set forth in 35 Ill. Adm. Code 219.405(c)(3) to opting out of such exclusions pursuant to 35 Ill. Adm. Code 219.411(g)(1)(B), or if there is a change at the source such that the exclusions no longer apply, certify compliance in accordance with 35 Ill. Adm. Code 219.411(g)(1)(B) within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing lines will be in compliance with the applicable requirements of 35 Ill. Adm. Code 219.407;
  - iii. If changing from opting out of the exclusions set forth in 35 Ill. Adm. Code 219.405(c)(3) pursuant to 35 Ill. Adm. Code 219.411(g)(1)(B) to utilization of such exclusions, certify compliance in accordance with 35 Ill. Adm. Code 219.411(g)(1)(A) within 30 days after making such change.
- h. Pursuant to 35 Ill. Adm. Code 219.904(b), all sources subject to the requirements of 35 Ill. Adm. Code Part 219 Subpart JJ shall:
- i. At least 30 calendar days before changing the method of compliance in accordance with 35 Ill. Adm. Code 219.901(b), (c), and (d), notify the Illinois EPA in writing of the change. The notification shall include a demonstration of compliance with the newly applicable subsection;
  - ii. Notify the Illinois EPA in writing of any violation of the requirements of 35 Ill. Adm. Code Part 219 Subpart JJ within 30 days following the occurrence of the violation and provide records documenting the violation upon request by the Illinois EPA;
- 21a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:



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Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

If you have any questions on this, please call David Hulskotter at 217/785-1705.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

REP:DWH:psj

cc: Illinois EPA, FOS Region 3  
Lotus Notes



Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the Flexographic and Lithographic Printing and Laminating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Water Based Ink Printing	24.0		
Solvent Based Ink Printing	6.0		
Adhesives Operations	4.8		
Solvents Operations	30.0		
Energy-Cured Ink	<u>12.0</u>	<u>----</u>	<u>----</u>
Totals	76.8	<u>7.9</u>	<u>19.9</u>